

United States District Court

WESTERN

DISTRICT OF

PENNSYLVANIA

BILL OF COSTS

WELLS HANN, et al.,

v.

Case Number:

NO. 00-1908-DWA

CRAWFORD & COMPANY

Case 2:00-cv-01908-DWA Document 156 Filed 09/08/2005 Page 1 of 19

Judgment having been entered in the above entitled action on August 9, 2005 against Plaintiffs Wells Hann, et al.,

Date

the Clerk is requested to tax the following as costs:

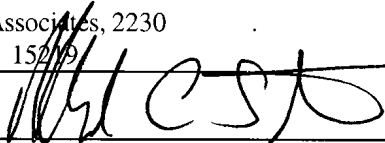
Fees of the Clerk	\$ 160.00
Fees for service of summons and subpoena	860.10
Fees of the court reporter for all or any part of the transcript necessarily obtained for use in the case	13,207.77
Fees and disbursements for printing	0
Fees for witnesses (itemize on reverse side)	639.00
Fees for exemplification and copies of papers necessarily obtained for use in the case	1,412.15
Docket fees under 28 U.S.C. 1923	0
Costs as shown on Mandate of Court of Appeals	0
Compensation of court-appointed experts	0
Compensation of interpreters and costs of special interpretation services under 28 U.S.C. 1828	0
Other costs (please itemize)	3,859.70
TOTAL \$	\$20,138.72

SPECIAL NOTE: Attach to your bill as itemization and documentation for requested costs in all categories.

DECLARATION

I declare under penalty of perjury that the foregoing costs are correct and were necessarily incurred in this action and that the services for which fees have been charged were actually and necessarily performed. A copy of this bill was mailed today with postage prepaid to:

Joseph E. Fieschko, Fieschko & Associates, 2230
Koppers Building, Pittsburgh, PA 15209

Signature of Attorney: 

Name of Attorney: Robert C. Stevens, Troutman Sanders, LLP

For: Crawford & Company

Name of Claiming Party

Date: 09/08/2005

Costs are taxed in the amount of _____ and included in the judgment.

By: _____

Clerk of Court

Deputy Clerk

Date

WITNESS FEES (computation, cf. 28 U.S.C. 1821 for statutory fees)

NAME AND RESIDENCE	ATTENDANCE		SUBSISTENCE		MILEAGE		Total Cost Each Witness
	Days	Total Cost	Days	Total Cost	Days	Total Cost	
see attached							
TOTAL							

Case 2:00-cv-01908-DWA Document 156 Filed 09/08/2005 Page 2 of 19

NOTICE**Section 1924, Title 28, U.S. Code (effective September 1, 1948) provides:**

“Sec. 1924. Verification of bill of costs.”

“Before any bill of costs is taxed, the party claiming any item of cost or disbursement shall attach thereto an affidavit, made by himself or by his duly authorized attorney or agent having knowledge of the facts, that such item is correct and has been necessarily incurred in the case and that the services for which fees have been charged were actually and necessarily performed.”

See also Section 1920 of Title 28, which reads in part as follows:

“A bill of costs shall be filed in the case and, upon allowance, included in the judgment or decree.”

The Federal Rules of Civil Procedure contain the following provisions:**Rule 54(d)**

“Except when express provision therefor is made either in a statute of the United States or in these rules, costs shall be allowed as of course to the prevailing party unless the court otherwise directs, but costs against the United States, its officers, and agencies shall be imposed only to the extent permitted by law. Costs may be taxed by the clerk on one day’s notice. On motion served within 5 days thereafter, the action of the clerk may be reviewed by the court.”

Rule 6(e)

“Whenever a party has the right or is required to do some act or take some proceedings within a prescribed period after the service of a notice or other paper upon him and the notice or paper is served upon him by mail, 3 days shall be added to the prescribed period.”

Rule 58 (In Part)

“Entry of the judgment shall not be delayed for the taxing of costs.”

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

WELLS HANN, JAMES COCO,)
EDWARD HANN, BILLY MYERS,)
FLOYD KING, and DOUG RADIGAN,)

Case 2:00-cv-01908-DWA Document 156 Filed 09/08/2005 Page 3 of 19

Plaintiffs,)

Civil Action No. 00-1908-DWA

v.)

CRAWFORD & COMPANY,)

Defendant.)

AFFIDAVIT OF ROBERT C. STEVENS IN SUPPORT OF
DEFENDANT'S BILL OF COSTS

Personally appeared before the undersigned officer, duly authorized by law to administer oaths, Robert C. Stevens, who, having been sworn, states, pursuant to 28 U.S.C. § 1924 and Local Rule 54.1, as follows:

1.

I am an attorney with the law firm of Troutman Sanders LLP, counsel for Defendant Crawford & Company, Inc. ("Crawford") in the above-styled matter, and I am an attorney of record in this matter. I have personal knowledge of the facts stated in this Affidavit, and I am of legal age and under no legal disability. I file this Affidavit with the Court in supplementation of and support for Crawford & Company's Bill of Costs, which is filed simultaneously herewith.

2.

On August 9, 2005, the United States District Court for the Western District of Pennsylvania entered judgment in favor of the Defendant in the above-referenced case.

3.

Pursuant to Rule 54 of the Federal Rules of Civil Procedure and 28 U.S.C. § 1920, Crawford & Company is now entitled to recover its costs incurred in this litigation. Rule 54(d) codifies the presumption that costs will be awarded to prevailing parties. Case 2:00-cv-01908-DWA Document 156 Filed 09/08/2005 Page 4 of 19 Transport, 224 F.3d 1012, 1039 (11th Cir. 2000) (en banc). Crawford has on this day filed a proper Bill of Costs, duly verified by me as counsel for Crawford, requesting **\$20,138.72** in total costs incurred by it in this litigation. (Each Plaintiff will be assigned 1/6th of recoverable costs attributable to the case. See Exhibit A, attached hereto for a breakdown of expenses for each Plaintiff.) These requested costs are detailed as follows:

4.

Crawford & Company seeks **\$160.00** for the fees of the Clerk, specifically the fees for Attorneys Robert H. Buckler, Robert C. Stevens, Benjamin D. Briggs, and Seth T. Ford to be admitted to appear on behalf of Crawford in defense of this case before the United States District Court for the Western District of Pennsylvania. This cost is expressly recoverable in this Court pursuant to Rule 54 of the Federal Rules of Civil Procedure. See Exhibit B, p. 1, attached hereto for an itemization of case costs.

5.

Crawford & Company seeks a total of **\$13,207.77** for the fees for various court reporters for transcribing and producing copies of the transcripts of the necessary depositions conducted in this case as well as a copy of the transcript of the trial. Each of these deposition transcripts were necessarily obtained for use in this case because: (1) Plaintiff listed the deponent as a witness who might testify at trial; (2) the deposition was taken at the direction of the court; or (3) a

substantial portion of the deposition transcripts were admitted into evidence for a dispositive motion (and response thereto), a motion in limine, or at the trial of this matter. E.E.O.C. v. W.O., Inc., 213 F.3d 600, 620 (11th Cir. 2000); see Zotos v. Lindbergh School District, 121 F.3d 356, 363 (8th Cir. 1997). These costs are recoverable under 28 U.S.C. § 1920. A chart detailing all depositions taken in this case and the costs for each is attached hereto as Exhibit B, pp. 1-2.

6.

Crawford & Company seeks **\$639.00** for witness fees incurred in this case. A chart listing the witnesses and the fees related to each of them is attached hereto as Exhibit B, p. 3.

7.

Crawford & Company also seeks **\$860.10** for fees incurred in the service of subpoenas for depositions and for appearance at trial. These fees are properly taxed as costs under 28 U.S.C. § 1920. A. Thompson v. Equifax Credit Info. Services, Inc., No. 00-A-1468-S, 2003 WL 1579270 (M.D. Ala. March 3, 2003). A chart showing the subpoenas served and the fees related to each is attached as Exhibit B, p. 2.

8.

Crawford & Company seeks **\$1,412.15** for fees for exemplification and copies of papers necessarily obtained for use in this case. Crawford & Company seeks to recover the costs of procuring copies from an outside copy source necessarily obtained for use in this case, as well as the costs of copying pleadings, motions, briefs and exhibits prepared in the defense of this case. A chart detailing copy costs is provided in Exhibit B, pp. 3 - 4.

9.

Crawford seeks **\$3,859.70** in fees for miscellaneous expenses, including the cost of searching for and viewing videotapes of the Exxon Valdez oil spill, the cost of the preparation of trial exhibits, the fee for an expert affidavit, and the fee for rental of a document camera to be used in preparation for trial. The specific itemization of these costs is provided in Exhibit B, p. 4.

10.

Under my direction, Barbara Conticelli of Troutman Sanders LLP assembled the documents and information underlying Crawford & Company's Bill of Costs. I have reviewed this information and I have personal knowledge of the items claimed therein. The attachment labeled Exhibit A includes a breakdown of costs to be attributed to each Plaintiff. The attachment labeled Exhibit B consists of charts detailing all of the disbursements claimed in Crawford & Company's Bill of Costs.

11.

Each item contained and claimed in Crawford & Company's Bill of Costs and described herein is correct and is an actual amount incurred or expended by Crawford & Company in

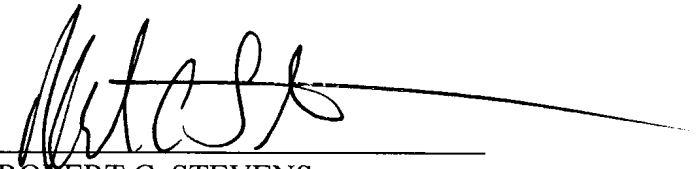
litigating this case. Each of these costs was absolutely and necessarily required and was reasonably incurred to represent Crawford & Company, and as such, these costs should be awarded to Crawford & Company.

All of these costs should be awarded to Crawford & Company because a reduction of or denial of costs “is in the nature of a penalty for some defection on the [prevailing party’s] part in the course of the litigation.” Chapman v. AI Transport, 229 F.3d 1012, 1039 (11th Cir. 2000) (*en banc*) (quoting Walters v. Roadway Express, Inc., 557 F.2d 521, 526 (5th Cir. 1977)). There are no grounds for such a penalty in this case. In addition, the financial status of the non-prevailing party is a factor that a district court may reasonably consider in awarding costs only when the non-prevailing party offers a substantial and clearly documented showing of a true inability to pay the prevailing party’s costs. Chapman, 229 F.3d at 1039; Smith v. Southeastern Penn. Transp. Auth., 47 F.3d 97, 100 (3rd Cir. 1995); McGill v. Faulkner, 18 F.3d 456, 459 (7th Cir. 1994); Cherry v. Champion Int’l Corp., 186 F.3d 442, 447 (4th Cir. 1999). Likewise, the relative wealth or financial standing of the parties in the case should not be considered in awarding costs under Rule 54. “Comparing the financial resources of the parties would unduly prejudice parties with assets and undermine ‘the presumption that [Rule 54] creates in prevailing parties’ favor, and . . . the foundation of the legal system that justice is administered to all equally, regardless of wealth or status.’” Chapman, 229 F.3d at 1039 (quoting Cherry, 186 F.3d at 448).

For these reasons, and pursuant to Rule 54 for the Federal Rules of Civil Procedure, Crawford & Company should be granted its costs as described above and as sought by its contemporaneously filed Bill of Costs in the full amount of **\$20,138.72**.


Case 2:00-cv-01908-DWA Document 156 Filed 09/08/2005 Page 8 of 19

FURTHER AFFIANT SAYETH NAUGHT.



ROBERT C. STEVENS

Sworn to and subscribed before me
this 8th day of September, 2005.



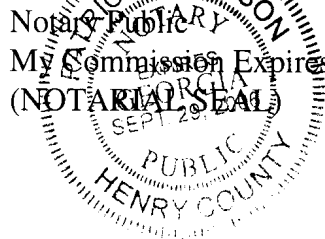
Notary Public
My Commission Expires:
(NOTARIAL SEAL)


EXHIBIT A

WELLS HANN, ET AL v. CRAWFORD & COMPANY
United States District Court for the Western District of Pennsylvania
Civil Action No. 00-1908-DWA

Itemization of Costs Attributable to each Plaintiff

FILING FEES

10/19/00	Troutman Sanders LLP	Pro Hac Vice Fees – Attorneys Robert H. Buckler, Robert C. Stevens, & Benjamin D. Briggs	\$120.00
03/04/05	Troutman Sanders LLP	Pro Hac Vice Fees – Attorney Seth T. Ford	\$40.00
		Subtotal:	\$160.00
		\$160.00 ÷ 6 = \$26.67	Total: \$26.67

TOTAL OF ALL FILING FEES PER PLAINTIFF = \$26.67

DEPOSITION EXPENSES

03/24/05	Troutman Sanders LLP	Powers, Garrison & Hughes - Deposition of Plaintiff, Edward Hann	\$1,309.20
03/24/05	Troutman Sanders LLP	Powers, Garrison & Hughes - Deposition of Plaintiff, Wells Hann	\$1,150.00
03/31/05	Troutman Sanders LLP	Associated Court Reporting – Depositions of Plaintiffs, Billy Myers and Doug Radigan	\$2,994.40
05/03/05	Troutman Sanders LLP	Goodman & Clark Reporting - Deposition of Dave Eytchison	\$129.55
05/05/05	Troutman Sanders LLP	Lindi S. Roberts & Associates – Deposition of Otto Harrison	\$561.50
05/06/05	Troutman Sanders LLP	DVS Legal Technology Services – Videotaping services for deposition of Otto Harrison	\$446.00
05/12/05	Troutman Sanders LLP	Advantage Court Reporting of Myrtle Beach - Deposition of Stuart Gilmer	\$132.50
05/12/05	Troutman Sanders LLP	Legal Video Services, Inc. – Videotaping services for Deposition of John Knight	\$745.00
05/26/05	Troutman Sanders LLP	Thompson Reporting Services – Deposition of John A. Knight	\$1,184.31
05/26/05	Troutman Sanders LLP	Thompson Reporting Services – Deposition of Bruce Stauf	\$279.63
05/31/05	Troutman Sanders LLP	Tri-State Reporting Services – Deposition of Lawrence Black	\$189.70

05/26/05	Troutman Sanders LLP	Video Works of Virginia – Videotaping services for deposition of William Tribble	\$39.00
06/02/05	Troutman Sanders LLP	Cook & Wiley, Inc. – Deposition of William Tribble	\$173.75
06/02/05	Troutman Sanders LLP	Norton, Schell & Braswell – Deposition of Patricia Wright	\$156.00
06/09/05	Troutman Sanders LLP	Coastal Reporting Service – Deposition of Don Carpenter	\$500.40
06/09/05	Troutman Sanders LLP	Houston Records Service - Deposition of Elda Coco	\$840.04
06/16/05	Troutman Sanders LLP	Michael D. Powers, Court Reporter – Trial transcript of May 16 – 17 and 19 – 20, 2005	\$2,376.79
		Subtotal:	\$13,207.77
		\$13,207.77 ÷ 6 = \$2,201.30	Total: \$2,201.30

TOTAL OF ALL DEPOSITION EXPENSES PER PLAINTIFF = \$2,201.30

PROCESS SERVER FEES

04/29/05	Troutman Sanders LLP	A Adam Detective Agency - Fee for service of subpoena to witness, Charlie Hitson	\$64.90
06/22/05	LeBoeuf, Lamb, Greene & MacRae	FCSI Process Service – Fee for service of subpoenas to trial witnesses	\$795.20
		Subtotal:	\$860.10
		\$860.10 ÷ 6 = \$143.35	Total: \$143.35

TOTAL OF ALL PROCESS SERVER FEES PER PLAINTIFF = \$143.35

WITNESS FEES

03/28/05	Troutman Sanders LLP	Stuart Gilmer	\$61.00
03/28/05	Troutman Sanders LLP	Dave Eytchison	\$48.00
03/28/05	Troutman Sanders LLP	Larry Black	\$45.00
03/28/05	Troutman Sanders LLP	Don Carpenter	\$72.00
03/28/05	Troutman Sanders LLP	Otto Harrison	\$69.00
03/28/05	Troutman Sanders LLP	William Tribble	\$49.00
03/28/05	Troutman Sanders LLP	Bruce Stauf	\$50.00
03/28/05	Troutman Sanders LLP	Patricia Wright	\$45.00
03/28/05	Troutman Sanders LLP	John Knight	\$50.00
04/28/05	Troutman Sanders LLP	Charlie Hitson	\$50.00
05/12/05	LeBoeuf, Lamb, Greene & MacRae	Linda Straka	\$50.00
05/18/05	LeBoeuf, Lamb, Greene & MacRae	Ruth Carosene	\$50.00
		Subtotal:	\$639.00
		\$639 ÷ 6 = \$106.50	Total: \$106.50

TOTAL OF WITNESS FEES PER PLAINTIFF = \$106.50

COPYING/BATES LABELING/PRINTING EXPENSES

03/04/05	Troutman Sanders LLP	U.S. District Court - Copy of Certificate of Good Standing – Attorney Seth T. Ford	\$15.00
03/21/05	Troutman Sanders LLP	In-house copies - Defendant's Motion for Summary Judgment, Statement of Facts in Support of Motion for Summary Judgment, Brief in Support of Motion for Summary Judgment and Appendix of Exhibits – 342 pages x 3 copies = 1,026 pages @ .15 per page	\$153.90
04/07/05	Troutman Sanders LLP	In house copies – Defendant's Response to Plaintiffs' Motion for Summary Judgment, Statement of Facts in Support of Defendant's Response, and Appendix of Exhibits – 299 pages x 3 copies = 897 pages @ .15 per page	\$134.55
05/03/05	Troutman Sanders LLP	Document Technologies, Inc. – Color Copies of Photographs	\$36.72
05/20/05	Troutman Sanders LLP	Document Technologies, Inc. – Color Copies of Photographs	\$238.68
05/24/05	Troutman Sanders LLP	Document Technologies, Inc. – Copies of trial exhibits	\$593.46

05/31/05	LeBoeuf, Lamb, Greene & MacRae	In-house Litigation Copies	\$46.80
06/08/05	LeBoeuf, Lamb, Greene & MacRae	T.J. Mackey's Copy Center – Copies of documents used for trial	\$8.56
06/22/05	LeBoeuf, Lamb, Greene & MacRae	T.J. Mackey's Copy Center – Copies of documents used for trial	\$181.48
06/30/05	LeBoeuf, Lamb, Greene & MacRae	In-house Litigation Copies	\$3.00
		Subtotal:	\$1,412.15
		$\$1,412.15 \div 6 = \235.36	Total: \$235.36

TOTAL OF COPY EXPENSES PER PLAINTIFF = \$235.36

MISCELLANEOUS EXPENSES

04/28/05	Troutman Sanders LLP	Media Production Associates – Fee for editing and viewing Exxon footage for FLSA posters	\$1,800.00
07/07/05	Troutman Sanders LLP	Trial Graphix – Fee for services of Design Consultant for preparation of trial exhibits	\$450.00
07/28/05	Troutman Sanders LLP	Ogletree Deakins – Fee for expert affidavit	\$850.00
07/07/05	LeBoeuf, Lamb, Greene & MacRae	ACBA Services – Fee for rental of Document camera used for trial	\$759.70
		Subtotal:	\$3,859.70
		$\$3,859.70 \div 6 = \643.28	Total: \$643.28

TOTAL OF ALL MISCELLANEOUS CHARGES FOR PER PLAINTIFF = \$643.28

<u>TOTAL OF ALL CASE COSTS=</u>	<u>\$20,138.72</u>
--	---------------------------

<u>TOTAL OF ALL COSTS TO BE ASSIGNED TO EACH PLAINTIFF=</u>	<u>\$3,356.46</u>
--	--------------------------

EXHIBIT B

WELLS HANN, ET AL v. CRAWFORD & COMPANY
United States District Court for the Western District of Pennsylvania
Civil Action No. 00-1908-DWA

FILING FEES

10/19/00	Troutman Sanders LLP	Pro Hac Vice Fees – Attorneys Robert H. Buckler, Robert C. Stevens, & Benjamin D. Briggs	\$120.00
03/04/05	Troutman Sanders LLP	Pro Hac Vice Fees – Attorney Seth T. Ford	\$40.00
		Subtotal:	\$160.00

TOTAL OF ALL FILING FEES = \$160.00

DEPOSITION EXPENSES

03/24/05	Troutman Sanders LLP	Powers, Garrison & Hughes - Deposition of Plaintiff, Edward Hann	\$1,309.20
03/24/05	Troutman Sanders LLP	Powers, Garrison & Hughes - Deposition of Plaintiff, Wells Hann	\$1,150.00
03/31/05	Troutman Sanders LLP	Associated Court Reporting – Depositions of Plaintiffs, Billy Myers and Doug Radigan	\$2,994.40
05/03/05	Troutman Sanders LLP	Goodman & Clark Reporting - Deposition of Dave Eytchison	\$129.55
05/05/05	Troutman Sanders LLP	Lindi S. Roberts & Associates – Deposition of Otto Harrison	\$561.50
05/06/05	Troutman Sanders LLP	DVS Legal Technology Services – Videotaping services for deposition of Otto Harrison	\$446.00
05/12/05	Troutman Sanders LLP	Advantage Court Reporting of Myrtle Beach - Deposition of Stuart Gilmer	\$132.50
05/12/05	Troutman Sanders LLP	Legal Video Services, Inc. – Videotaping services for Deposition of John Knight	\$745.00
05/26/05	Troutman Sanders LLP	Thompson Reporting Services – Deposition of John A. Knight	\$1,184.31
05/26/05	Troutman Sanders LLP	Thompson Reporting Services – Deposition of Bruce Stauf	\$279.63
05/31/05	Troutman Sanders LLP	Tri-State Reporting Services – Deposition of Lawrence Black	\$189.70
05/26/05	Troutman Sanders LLP	Video Works of Virginia – Videotaping services for deposition of William Tribble	\$39.00
06/02/05	Troutman Sanders LLP	Cook & Wiley, Inc. – Deposition of William Tribble	\$173.75

06/02/05	Troutman Sanders LLP	Norton, Schell & Braswell – Deposition of Patricia Wright	\$156.00
06/09/05	Troutman Sanders LLP	Coastal Reporting Service – Deposition of Don Carpenter	\$500.40
06/09/05	Troutman Sanders LLP	Houston Records Service - Deposition of Elda Coco	\$840.04
06/16/05	Troutman Sanders LLP	Michael D. Powers, Court Reporter – Trial transcript of May 16 – 17 and 19 – 20, 2005	\$2,376.79
		Subtotal:	\$13,207.77

Case 2:00-cv-01908-DWA Document 158 Filed 09/08/2005 Page 16 of 19

TOTAL OF ALL DEPOSITION EXPENSES = \$13,207.77

PROCESS SERVER FEES

04/29/05	Troutman Sanders LLP	A Adam Detective Agency - Fee for service of subpoena to witness, Charlie Hitson	\$64.90
06/22/05	LeBoeuf, Lamb, Greene & MacRae	FCSI Process Service – Fee for service of subpoenas to trial witnesses	\$795.20
		Subtotal:	\$860.10

TOTAL OF ALL PROCESS SERVER FEES = \$860.10

WITNESS FEES

03/28/05	Troutman Sanders LLP	Stuart Gilmer	\$61.00
03/28/05	Troutman Sanders LLP	Dave Eytchison	\$48.00
03/28/05	Troutman Sanders LLP	Larry Black	\$45.00
03/28/05	Troutman Sanders LLP	Don Carpenter	\$72.00
03/28/05	Troutman Sanders LLP	Otto Harrison	\$69.00
03/28/05	Troutman Sanders LLP	William Tribble	\$49.00
03/28/05	Troutman Sanders LLP	Bruce Stauf	\$50.00
03/28/05	Troutman Sanders LLP	Patricia Wright	\$45.00
03/28/05	Troutman Sanders LLP	John Knight	\$50.00
04/28/05	Troutman Sanders LLP	Charlie Hitson	\$50.00
05/12/05	LeBoeuf, Lamb, Greene & MacRae	Linda Straka	\$50.00
05/18/05	LeBoeuf, Lamb, Greene & MacRae	Ruth Carosene	\$50.00
		Subtotal:	\$639.00

TOTAL OF WITNESS FEES = \$639.00

COPYING/BATES LABELING/PRINTING EXPENSES

03/04/05	Troutman Sanders LLP	U.S. District Court - Copy of Certificate of Good Standing – Attorney Seth T. Ford	\$15.00
03/21/05	Troutman Sanders LLP	In-house copies - Defendant's Motion for Summary Judgment, Statement of Facts in Support of Motion for Summary Judgment, Brief in Support of Motion for Summary Judgment and Appendix of Exhibits – 342 pages x 3 copies = 1,026 pages @ .15 per page	\$153.90
04/07/05	Troutman Sanders LLP	In house copies – Defendant's Response to Plaintiffs' Motion for Summary Judgment, Statement of Facts in Support of Defendant's Response, and Appendix of Exhibits – 299 pages x 3 copies = 897 pages @ .15 per page	\$134.55
05/03/05	Troutman Sanders LLP	Document Technologies, Inc. – Color Copies of Photographs	\$36.72
05/20/05	Troutman Sanders LLP	Document Technologies, Inc. – Color Copies of Photographs	\$238.68
05/24/05	Troutman Sanders LLP	Document Technologies, Inc. – Copies of trial exhibits	\$593.46
05/31/05	LeBoeuf, Lamb, Greene & MacRae	In-house Litigation Copies	\$46.80
06/08/05	LeBoeuf, Lamb, Greene & MacRae	T.J. Mackey's Copy Center – Copies of documents used for trial	\$8.56
06/22/05	LeBoeuf, Lamb, Greene & MacRae	T.J. Mackey's Copy Center – Copies of documents used for trial	\$181.48
06/30/05	LeBoeuf, Lamb, Greene & MacRae	In-house Litigation Copies	\$3.00
		Subtotal	\$1,412.15

TOTAL OF COPY EXPENSES = \$1,412.15

MISCELLANEOUS EXPENSES

04/28/05	Troutman Sanders LLP	Media Production Associates – Fee for editing and viewing Exxon footage for FLSA posters	\$1,800.00
07/07/05	Troutman Sanders LLP	Trial Graphix – Fee for services of Design Consultant for preparation of trial exhibits	\$450.00
07/28/05	Troutman Sanders LLP	Ogletree Deakins – Fee for expert affidavit	\$850.00
07/07/05	LeBoeuf, Lamb, Greene & MacRae	ACBA Services – Fee for rental of Document camera used for trial	\$759.70
		Subtotal:	\$3,859.70

TOTAL OF ALL MISCELLANEOUS CHARGES = \$3,859.70

<u>TOTAL OF ALL CASE COSTS=</u>	<u>\$20,138.72</u>
--	---------------------------

IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA

WELLS HANN, JAMES COCO,)
EDWARD HANN, BILLY MYERS,)
FLOYD KING, and DOUG RADIGAN,)

Case 2:00-cv-01908-DWA

Document 156

Filed 09/08/2005

Page 19 of 19

Plaintiffs,)

Civil Action No. 00-1908-DWA

v.)

CRAWFORD & COMPANY,)

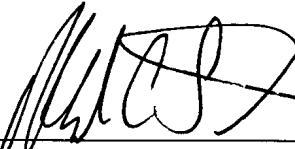
Defendant.)

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of this ***BILL OF COSTS*** with attached ***AFFIDAVIT OF ROBERT C. STEVENS IN SUPPORT OF DEFENDANT'S BILL OF COSTS*** has been served upon Plaintiff by depositing same in the United States Mail on this day in a properly addressed envelope with adequate postage thereon as follows:

Joseph Fieschko, Esq.
Fieschko & Associates
2230 Koppers Building
Pittsburgh, PA 15219

This 8th day of September, 2005.


Robert C. Stevens